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FAMALIES

August 1, 1991

Mr. Gary Sanderson
Department of Environmental Protection
Bureau of Environmental Evaluation
and Cleanup Responsibility Assessment
401 E. State Street
CN 028
Trenton, New Jersey 08625

RE: Hexcel Corporation ECRA Case No. 86009

Dear Mr. Sanderson:

I have received and reviewed your letter of July 12, 1991 regarding the request for additional information and chemical testing of soil and ground water at the Fine Organics Corporation facility (formerly owned by Hexcel Corporation) in Lodi, New Jersey.

In response to your request, I have instructed Hexcel's contractors, Heritage Remediation/Engineering, Inc. and ENVIRON Corporation, to begin assembling the additional information you require. To the extent this information is readily available, it will be included, as requested, in the August 15, 1991 Progress Report. Some of the requested information, however, will require substantial effort to compile and assemble data and prepare maps (e.g., the remapping of chemical contaminates from sitewide data). I propose that information of this type be included in the September 15, 1991 Progress Report to allow adequate time for assembly of data, preparation of maps and quality control.

A substantial portion of your letter dealt with the request for additional environmental testing at the Lodi facility. It has been my impression that the prior testing conducted by Hexcel complied with the requirements of the approved sampling plan. It is apparent, however, that there are new areas of concern where you desire additional testing. In my view, this concern may be caused by earlier work or possibly by incomplete or not readily available earlier developed test data. (I'm sure you agree that we have developed an immense amount of test data and simply retrieving a specific piece of data can be a challenge.) I am concerned that any further tests performed in response to your letter be responsive to your needs and not duplicate previous work in order for Hexcel to bring closure to the sampling portion of the project.

Mr. Gary Sanderson August 1, 1991 Page Two

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Accordingly, I have instructed ENVIRON Corporation to prepare a specific proposal, identifying samples to be collected and chemical tests to be performed in addition to reviewing data relevant to the new areas of concern, in order to address the issues you have raised. Before undertaking the substantial investment to perform this work, however, I am requesting the concurrence of your Department with the proposed testing to ensure that this issue can be fully resolved. We hope to send you the proposal for this additional testing during the week of August 12 for your review. I am requesting a meeting to discuss this proposal with you and to resolve any remaining questions, I propose we meet either August 22 or 23. I understand you have discussed and agreed to this meeting with Joe Richie (HRE), subject to scheduling a time and place.

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Assuming agreement at the meeting, Hexcel will then immediately proceed to perform the required work. Allowing for mobilization of drilling equipment and analysis of samples in an environmental laboratory, I would anticipate the sampling would be complete by mid-September with reporting of the data by October 15. This would represent approximately a 30-day extension of the schedules outlined in your letter.

I will contact you early next week on this matter, and to discuss a time and place for our requested meeting.

Very truly yours,

HEXCEL CORPORATION

A. William Nosil

Corporate Environmental Engineering Manager

AWN:pgh

cc: J. Higdon, Fine Organics

R. Powell, ENVIRON Corporation

J. Ritchey, Heritage Remediation/ Engineering, Inc.